

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AARON ABADI,

Plaintiff,

- against -

AMERICAN AIRLINES GROUP., INC., et al.,

Defendants.

Case No.: 1:23-cv-04033-LJL

**DECLARATION IN SUPPORT
OF MOTION TO DISMISS**

Onur Firat Ozcan, hereby declares and states, as follows:

1. I am employed by Turk Hava Yollari, A.O. (“THY”) as its Acting General Manager in New York. I have been employed by THY for 11 years. As a result of my duties, I am fully familiar with THY’s business operations. I have reviewed and am familiar with the allegations in Plaintiff’s Complaint and Supplemental Complaint.

2. THY is an international air carrier organized and existing under the laws of the Republic of Turkey, with its headquarters and principal place of business located in Istanbul, Turkey. It is the national air carrier of Turkey.

3. Since its inception, THY has existed under the laws of Turkey and always has had its principal place of business located in Turkey. THY has never, even for a temporary time-period, relocated its principal place of business and headquarters from Turkey to the United States. THY also never has maintained a de facto principal place of business or headquarters in the United States.

4. All of THY's shareholder and board of directors' meetings take place in Turkey, and all aspects of THY's worldwide corporate operations are controlled from Turkey.

5. Exhibit 71 of Plaintiff's Complaint is a September 11, 2021, email from THY's Customer Contact Center. At all times relevant to the Complaint, THY's Customer Contact Center was located in Turkey.

6. I note that plaintiff has named as a defendant in this litigation an entity known as Turkish Airlines, Inc. This entity is a separate and distinct legal entity from THY. It is a "paper" entity incorporated in New York that has no employees or assets, and has no involvement in the commercial air transportation operations conducted by THY.

I hereby declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 15, 2024.



Onur Fırat Özcan